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DISTRICT OF DELAWARE  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

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LA MAR GUNN,  
*Plaintiff,*

-v-

SPECIALIZED LOAN SERVICING LLC  
and JOHN CHARLES BEGGINS,  
*Defendants.*

Civ. Action No. 15 - 810

COMPLAINT  
*Pro se*

**Jury Trial Demanded**

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COMPLAINT AND DEMAND FOR JURY TRIAL

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I. INTRODUCTION

1. This is an action for actual and statutory damages brought by Plaintiff, LA MAR GUNN (hereinafter "GUNN"), appearing *propria persona*, and without waving any right, for violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* (hereinafter "FDCPA"), which prohibits debt collectors from engaging in abusive, deceptive, and unfair practices.

## II. JURISDICTION

2. Jurisdiction of this court arises under 15 U.S.C. § 1692k(d) and 28 U.S.C. § 1337. Declaratory relief is available pursuant to 28 U.S.C. §§ 2201 and 2202. Venue in this District is proper in that the defendant transacts business here and the conduct complained of occurred here.

## III. PARTIES

3. Plaintiff, LA MAR GUNN, is a natural person residing in City of Dover, County of Kent, Delaware.

4. Defendant, SPECIALIZED LOAN SERVICING LLC (*hereinafter* “SLS”) is a Colorado company engaged in the business of collecting debt in this state with its principal place of business located at 8742 Lucent Boulevard, Suite 300, Highlands Ranch, Colorado, 80129. The principal purpose of Defendant is the collection of debts in this state and defendant regularly attempts to collect debts alleged in another.

5. Defendant, JOHN CHARLES BEGGINS, also known as JOHN BEGGINS (*hereinafter* “Beggins”), with his principal residence located at 50 Meade Lane, Englewood, Colorado, 80113, is a natural person employed by SLS as a collector at all times relevant to this complaint.

6. Defendants are engaged in the collection of debts from consumers using the mail and telephone. Defendants regularly attempt to collect consumer debts alleged

to be due to another. Defendants are “debt collectors” as defined by the FDCPA, 15 U.S.C. § 1692a(6).

#### **IV. FACTUAL ALLEGATIONS**

7. By correspondence on the letterhead of SLS and by telephone, defendants claimed to be the servicer of an alleged mortgage debt belonging to plaintiff.

8. Plaintiff did not have any relationship with the defendants and was involved in a mortgage relationship with Ocwen Loan Servicing LLC (“Ocwen”), where monthly mortgage payments have never been late.

9. Plaintiff’s was set-up with an automatic draft of monthly payments.

10. Defendants, without any notice began reporting negative information to the 3 primary credit reporting agencies (TransUnion, Experian, and Equifax) slandering plaintiff’s stellar credit rating despite his perfect payment history.

11. As a result of the acts alleged above, Plaintiff suffered termination of long-standing credit lines, denial of new credit lines, loss of business, and damage to his triple A credit rating.

#### **V. CLAIM FOR RELIEF**

12. Plaintiff repeats and realleges and incorporates by reference to the foregoing paragraphs.

13. Defendants violated the FDCPA. Defendants’ violations include, but are not limited to the following:

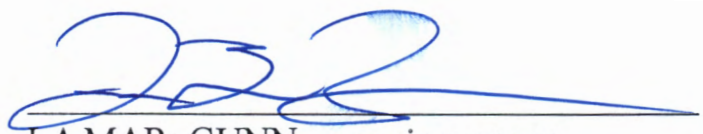
- a) Misrepresentations about Owing a Debt
- b) False or Misleading Representations
- c) Unlawful Failure to Cease Communications
- d) Annoying, Abusive, or Harassing Telephone Calls

14. As a result of the foregoing violations of the FDCPA, defendants are liable to Gunn for declaratory judgment that defendants' conduct violated the FDCPA, actual damages, statutory damages, costs, and any attorney fees.

**WHEREFORE**, plaintiff Gunn respectfully requests that judgment be entered against defendants SLS and Beggins for the following:

- A. Declaratory judgment that the defendants' conduct violated the FDCPA;
- B. Actual damages;
- C. Statutory damages pursuant to 15 U.S.C. § 1692k;
- D. Costs and reasonable attorneys fees pursuant to 15 U.S.C. § 1692k;
- and
- E. For such other and further relief as the Court may deem just and proper.

**RESPECTFULLY SUBMITTED** this 14th day of September, 2015.

A handwritten signature in blue ink, appearing to read 'LA MAR: GUNN', is written over a horizontal line.

LA MAR: GUNN, *propria persona*

Signed reserving all my rights at UCC 1-308

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14th day of September, 2015, the foregoing Document was sent by regular U.S. Mail to:

**Specialized Loan Servicing LLC**  
**8742 Lucent Boulevard**  
**Suite 300**  
**Highlands Ranch, Colorado, 80129**

**John Beggins**  
**50 Meade Lane**  
**Englewood, Colorado, 80113**

On this Monday the 14th day of September, 2015.



LA MAR: GUNN, *propria persona*  
Signed reserving all my rights at UCC 1-308

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